

THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE: §  
§  
FRANK TITUS AVIGNONE § CASE NO. 14-41587-R  
XXX-XX-9679 §  
3504 FLINTSTONE DRIVE § CHAPTER 13  
PLANO, TX 75074 §  
§  
SARAH SIEG AVIGNONE §  
XXX-XX-4933 §  
§  
DEBTORS §

TRUSTEE'S OBJECTION TO DEBTORS' MOTION TO MODIFY CHAPTER 13 PLAN AFTER  
CONFIRMATION

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT:

COMES NOW CAREY D. EBERT, the Standing Chapter 13 Trustee, and files this Objection to Debtors' Motion to Modify Chapter 13 Plan After Confirmation in the above styled case, and for cause would show the Court the following:

The Trustee objects to the Debtors' Motion to Modify Chapter 13 Plan After Confirmation on the following grounds:

The order proposes to relieve the attorney from representation without cause.

WHEREFORE, PREMISES CONSIDERED, Carey D. Ebert, The Standing Chapter 13 Trustee, prays that the Court set a hearing on the matter and enter an order denying the Debtors' Motion to Modify Chapter 13 Plan After Confirmation and providing such other relief as is just and equitable.

Respectfully submitted,

/s/ Shelly Terrill

Carey D. Ebert, Chapter 13 Trustee, TBN 05332500  
Shelly Terrill, TBN 00794788  
Office of the Standing Chapter 13 Trustee  
500 North Central Expressway, Suite 350  
Plano, Texas 75074  
(972) 943-2580 / Fax (972) 943-8050

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Objection to Debtors' Motion to Modify Chapter 13 Plan After Confirmation has been served upon the following parties in interest on the date set forth below by mailing a copy of same to them via first class mail.

FRANK TITUS AVIGNONE  
SARAH SIEG AVIGNONE  
3504 FLINTSTONE DRIVE  
PLANO, TX 75074

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MIAMI, FL 33131-1605

Dated: March 10, 2016

/s/ Shelly Terrill

Office of the Standing Chapter 13 Trustee